

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

Division



Case No.

1:20CV47
(to be filled in by the Clerk's Office)

Leonard A. Robinson, Peggy M. Hairston Robinson,
Peggy M. H. Robinson, APLC

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Cassandra L. Brooks, Cassidy Professional
Counseling, Inc, Charles M Alexander, Heather R.
Alexander, A.L. Collins, Attorney Bryant Thompson,
William Walker, Stafford R. Peebles, Jr.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION AND STAY ORDER

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Peggy M Hairston Robinson</u>
Street Address	<u>2918 Little Farms Drive</u>
City and County	<u>Zachary - East Baton Rouge Parish</u>
State and Zip Code	<u>Louisiana, 70791</u>
Telephone Number	<u>225-337-0158 or 225-235-6060</u>
E-mail Address	<u>pmhrobinson@yahoo.com</u>

I-A: The Plaintiff(s) – (continued)

Name	<u>Leonard A. Robinson</u>
Street Address	<u>2918 Little Farms Drive</u>
City and County	<u>Zachary – East Baton Rouge Parish</u>
Telephone Number	<u>Louisiana, 70791</u>
E-mail Address	<u>pmhrobinson@yahoo.com</u>

Name	<u>Peggy M. H. Robinson, APLC</u>
Street Address	<u>4811 Harding Blvd., Suite 124</u>
City and County	<u>Baton Rouge – East Baton Rouge Parish</u>
Telephone Number	<u>Louisiana, 70811</u>
E-mail Address	<u>pmhrobinson@yahoo.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Cassandra L. Brooks
Job or Title <i>(if known)</i>	(Believed) - Grant Writer for University of Michigan
Street Address	1082 Western Hills Drive
City and County	Flint - Genesee
State and Zip Code	Michigan, 48532
Telephone Number	810-252-6044
E-mail Address <i>(if known)</i>	cassandralbrooks@yahoo.com

Defendant No. 2

Name	Cassidy Professional Counseling, Inc.
Job or Title <i>(if known)</i>	
Street Address	225 Brookside Drive
City and County	Flushing - Genesee
State and Zip Code	Michigan, 48433
Telephone Number	810-252-6044
E-mail Address <i>(if known)</i>	cassandralbrooks@yahoo.com

Defendant No. 3

Name	Charles M. Alexander
Job or Title <i>(if known)</i>	
Street Address	179 Kentland Ridge Drive
City and County	Kernersville - Forsyth
State and Zip Code	North Carolina, 27284
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Heather R. Alexander
Job or Title <i>(if known)</i>	
Street Address	179 Kentland Ridge Drive
City and County	Kernersville - Forsyth
State and Zip Code	North Carolina, 27284
Telephone Number	336-812-3007
E-mail Address <i>(if known)</i>	

1-B: The Defendant(s) – (continued)

Defendant No. 5

Name	<u>A.L. Collins</u>
Job or Title <i>(if known)</i>	<u>Attorney-at-Law</u>
Street Address	<u>430 West Mountain Street</u>
City and County	<u>Kernersville – Forsyth County</u>
State and Zip Code	<u>North Carolina</u>
Telephone Number	<u>336-996-7921</u>
E-mail Address <i>(if known)</i>	<u>acollins@kernersvillelawyers.com</u>

Defendant No. 6

Name	<u>William Walker</u>
Job or Title <i>(if known)</i>	<u>Attorney-at-Law</u>
Street Address	<u>110 Oakwood Drive</u>
City and County	<u>Winston-Salem – Forsyth County</u>
State and Zip Code	<u>North Carolina, 27103</u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 7

Name	<u>Attorney Bryant Thompson</u>
Job or Title <i>(if known)</i>	<u>Attorney-at-Law; Guardian of the Estate of Ms. Irene Fulton Hairston</u>
Street Address	<u>1035 Cherry Street</u>
City and County	<u>Winston-Salem – Forsyth County</u>
State and Zip Code	<u>North Carolina, 27101</u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

Defendant No. 8

Name	<u>Stafford R. Peebles, Jr., P.C.</u>
Job or Title <i>(if known)</i>	<u>Attorney-at-Law</u>
Street Address	<u>102 North Cherry Street</u>
City and County	<u>Winston-Salem – Forsyth County</u>
State and Zip Code	<u>North Carolina, 27101</u>
Telephone Number	<u></u>
E-mail Address <i>(if known)</i>	<u></u>

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Peggy M. Hairston Robinson, is a citizen of the State of *(name)* Louisiana.

b. If the plaintiff is a corporation

The plaintiff, *(name)* Peggy M. H. Robinson, APLC, is incorporated under the laws of the State of *(name)* Louisiana, and has its principal place of business in the State of *(name)* Louisiana.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of _____.

Named Defendants:

1. A.L. Collins, Attorney-at-Law (personally)
Principle place of business, State of North Carolina, Kernersville, N.C.
2. William Walker, Attorney-at-Law (personally)
Principle place of business, Winston-Salem, N.C.
3. Bryant Thompson, (Guardian of the Estate of Ms. Irene Fulton Hairston and personally)
Principle place of business, Winston-Salem, N.C. at
1035 Cherry Street, Winston-Salem, N.C.
4. Stafford R. Peebles ,Jr. (individually)
102 North Cherry Street
Winston-Salem, N.C. 27101

These attorneys appear to have formed a “criminal enterprise” such as described in RICO Statute.

Actual damage claim is:

(1) Loss of professional licenses to practice law in state of Louisiana due to interference of N. C. officials	500,000.00
(2) Mental Anguish	1,000,000.00
(3) Defamation of Character (reputation)	1,000,000.00
(4) Litigation Expense	500,000.00
(5) Medical expenses; pain and suffering	1,000,000.00
TOTAL DAMAGES & LOSS	4,000,000.00

(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Cassidy Professional Counseling, Inc, is incorporated under the laws of the State of (name) Michigan, and has its principal place of business in the State of (name) Michigan.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) Flushing, Michigan.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Because Plaintiff, the Robinsons, have advanced more than \$200,000.00 to preserve, maintain property in this suit in monthly payments to PNC Bank, state taxes in an amount and other costs, \$75,000.00. They have maintained this property by paying taxes for over 20 years and doing other managerial and financial causes. The total amount in contraversion is \$4,000,000.00.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

The events giving rise to this claim occurred in Forsyth County, Kernersville, North Carolina and extended to East Baton Rouge Parish - Baton Rouge, Louisiana. The last event occurred and involved the heirs of Ruby Jewel Brooks; who are residents of the State of Michigan.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Loss occurred (May 21, 2019) The beginning date of this event was April 2004 when the 21st JDC of Forsyth County arbitrarily and capriciously and with no probable cause appointed Attorney Bryan Thompson as guardian of the Estate for Ms. Irene Fulton Hairston who was not incompetent and even if she were declared incompetent, she had in place a set of written instructions properly prepared by North Carolina legal authorities. A Specific Power of Attorney with predetermined medical directives attached on file of records in Forsyth County 21st JDC.

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

On or about May 21, 2019, Cassandra L. Brooks formed a (dummy) cooperation involving immovable property belonging by inheritance to her aged uncle and aunt. This criminal act was done by theft, by fraud and deception. See criminal report by Louisiana police report prepared by Michigan authorities.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Monetary damages would not be adequate compensation for me and my family because this 12 acre spot was the home site of our great-grandparents. We planned to build, relocate there shortly. The property has been in family for 125 years and the Robinsons have invested their retirement funds to preserve this property (80 acres) for the family. Compensation could not be measured due to estatic and sentimental values of ancestors.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff herein asks the Court to grant reprieve by granting injunctive relief from sale all inherited property wherefore distributed illegally until all civil, criminal and financial matters have been resolved in all courts and states. The basis for this claim is that "But For" the wrongful actions and governmental interference, parents of the Plaintiff in this action did provide a will with a specific power of attorney and a predetermination agreement prepared by licensed North Carolina Counsel (Mr. Joseph Coltrane). Prepared directives by the parents gave clear property executed by their attorney, directives and instructions as to how their final affairs should be concluded and how the widow should be cared for. The wrongful distribution of assets as alleged continues after years of fraud by a guardian appointed with no authority by a Clerk of Court in Forsyth County. The Clerk of Court of Forsyth County, Ms. Susan Faye now retired appointed a guardian for Ms. Irene Fulton Hairston's estate while she was competent. And without probable cause sold last surviving parent's property (homestead), mismanaged and or wasted away her assets to cover fees and would not provide her care with adequate funds last surviving parent had in place. As a consequence to the illegal actions of the appointed guardian, having declared Ms. Irene Fulton Hairston incompetent, when in fact she was not, did award his colleagues across interstate lines commerce with ill gotten gains from the estate of Ms. Hairston and has caused professional harm and ruin to the Plaintiff (Ms. Irene Fulton Hairston's daughter Peggy M. Hairston Robinson (former legal counsel) and her Spouse Mr. Leonard Robinson). And forced the Plaintiff to move her mother (Ms. Irene Fulton Hairston) to Louisiana for her safety and care while assuming total financial responsibility for the same in access of \$300,000.00 without repayment from the estate. Immediate Stay and Injunctive Relief is needed to stop any further damage to property.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1-7-2020

Signature of Plaintiff

Printed Name of Plaintiff

Peggy M. Hairston Robinson
Peggy M. Hairston Robinson

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address